

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

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|-----------------------|---|---------------------------------|
| Carla Gericke, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | Civil Action No. 11-CV-00231-SM |
| Town of Weare, et al. |) | |
| |) | |
| |) | |
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| |) | |
| |) | PLAINTIFF'S ASSENTED-TO |
| |) | MOTION TO EXTEND PRE- |
| |) | TRIAL STATEMENT DEADLINE |

COMES NOW the Plaintiff, Carla Gericke, by and through the undersigned Counsel and for her Assented-to Motion to Extend the Pre Trial Statement Deadline, states and moves this Honorable Court as follows:

1. This Motion is brought pursuant to, and in accordance with, Local Rule 7.1.
2. On August 16, 2011, this Honorable Court entered a Pre-trial Order approving the Parties Proposed Discovery Plan.
3. Currently, the Pre-Trial Statement Deadline is scheduled for August 20, 2012.

Objections are due September 4, 2012 and the Final Pre-Trial Conference is scheduled for September 7, 2012. The Trial Date is scheduled for the two-week period beginning September 18, 2012.

4. All Parties have filed Motions for Summary Judgment. None of the Motions have been ruled upon yet, and therefore, the Parties are uncertain what specific issues will be tried.

5. Therefore, the Parties request additional time to file their Pre-Trial Statements so as to conform to the Order on the Motions for Summary Judgment. The Parties anticipate that extending the deadline to August 27, 2012 should be sufficient.
6. The Parties do not anticipate that the requested extension will affect the Objection Deadline, the Pre-Trial date, or the Trial Date.
7. This Motion is fully assented-to.
8. Plaintiff is not attaching a Memorandum of Law as granting or denying this Motion is within the sound discretion of this Honorable Court, and all relevant law has been cited herein.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant the following relief:

- A. Grant this Motion and extend the Pre-Trial Statement deadline to August 27, 2012; and
- B. Grant any further relief that this Honorable Court deems just and proper.

Dated: August 16, 2012

Respectfully submitted,
Carla Gericke,
By, The Law Offices of
Martin & Hipple, PLLC

/s/Stephen T. Martin
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CERTIFICATE OF SERVICE

COMES NOW Attorney Stephen T. Martin, Counsel for the Plaintiff, and hereby certifies that I have caused a copy of the foregoing Motion to be delivered to Counsel for the Defendants using this Court's CM/ECF system.

Dated: August 16, 2012

/s/Stephen T. Martin

Stephen T. Martin, Esq.